

Exhibit A

From: [Pearlson, A. Ross](#)
To: [Wylie Stecklow](#)
Cc: [remy green](#); ccarbone@loeb.com; [Tyrrell, Daniel J.](#)
Subject: RE: Cypress v. Sport-BLX/Sport-BLX v. Cypress
Date: Monday, October 10, 2022 2:29:38 PM
Attachments: [image001.png](#)
[image002.png](#)

Wylie and Remy,

During today's meet and confer, despite our expressed belief that we are under no obligation to do so, we repeated our offer to provide you with a list of the partners of Cypress Holdings, III, L.P. ("Cypress"), including the addresses and states of citizenship of the individuals and/or entities who are partners of Cypress (as well as, where applicable, the addresses and states of citizenship of the individual members of the partner entities) subject to the sole limitation that the names of the individual/entity partners be redacted. In the alternative, we offered to speak with our client today, and respond to you no later than tomorrow morning, as to whether our client would consent to the disclosure of a list of Cypress' partners, including the names of the individuals/entities without redaction, provided that such disclosure be made with an Attorneys' Eyes Only ("AEO") designation. At no point in our discussions did you ever explain why the specific identities of each limited partner was necessary for establishing diversity jurisdiction, or why are offered compromises were insufficient for such purposes. Yet, not even an hour after concluding our meet and confer (in which you were supposedly considering our proposals), we received your email below and your filing of a four-page letter with the Court. It is clear, based on your email and subsequent filing of a letter with the Court not even an hour later, that you had no intention of engaging in a meaningful meet and confer on this issue, and that our discussions were intended simply to enable you to fill in your letter to the Court. We will respond to your letter to the Court in due course.

Sincerely,

Ross

From: Wylie Stecklow <wylie@wylielaw.com>
Sent: Monday, October 10, 2022 12:19 PM
To: Tyrrell, Daniel J. <dtyrrell@csglaw.com>
Cc: Pearlson, A. Ross <rpearlson@csglaw.com>; [remy green <remy@femmelaw.com>](mailto:remy@femmelaw.com);
ccarbone@loeb.com
Subject: Re: Cypress v. Sport-BLX/Sport-BLX v. Cypress

Ross, Daniel & Chris

Thanks for taking the time for the call today. We will have a draft of Wednesday's letter for you to review before the due date. As we have waited since last week for the jurisdictional information and today's final offer was that you were going to share information such as addresses and citizenship for each partner of Cypress, but not the names of such entities or individuals, it seems we are at an impasse. Although you floated the possibility of checking whether your client would produce names of the entities for attorney eyes only, as we have waited a week for your client's jurisdictional information already, we don't have further time to delay. We also think the relevant showing for AEO is lacking.

We intend to file a letter today concerning this issue, and then a joint letter Wednesday as required by the Court's order.

Wylie
